

I have been a licensed Amateur Radio Operator for 48 years, getting my Novice in January 1955 and earning my Amateur Extra in 1977. I became a VE in 1984. Further, I worked in electronics for 20 years and am now a Professor Emeritus, having retired from a major community college district after twenty years. I am neither an engineer nor attorney, as many of the writers of petitions and comments seem to be. Still, this background gives me good insight into the level of knowledge needed to function on technical and communications planes.

I speak only for myself, not for any amateur related organizations that I belong to; nor do they speak for me.

Appendix I

Technician

Eliminating element 1 will instantly upgrade 37.7% of the current amateur licensees. I agree with improving Element 2, but wonder if the current 35 question format should be upped to 50 to adequately do the required testing.

General

I do not agree with dropping Element 1. I agree with improving Element 3, but wonder if the current 35 question format should also be upped to 50 to adequately do the required testing.

Extra

I concur and appreciate their discussion of the merits of Morse

VEC Qualifications

I appreciate the historical note, which many newcomers may not be aware of.

Examination contents and administration

Paragraph 1 I concur. Power of control has slowly eroded to the point where there is little oversight of the NCVEC.

Paragraph 2 HOORAY!!! I emphatically concur. When the FCC gave exams, there was a 30 day retest period (60 days for commercial licenses). Perhaps a minimum 14 day (two week) retest wait would be appropriate. At our VE sessions, I would guess that there is about a 25% retest rate.

There would be a possible tracking issue here. Joe Ham could fail an element on Saturday morning, go to another session that afternoon, fail again and finally pass it somewhere else on Sunday. Who would know, since he used three different VEC's? This comes under 97.509(j)

A simple solution:

Since the VE session manager sends the report to the VEC and the VEC's are under the NCVEC, all reports should go to the FCC via the NCVEC (isn't this what they are for?). Yes, actions could be delayed by a day or two, but this isn't like the weeks in the old FCC days. Merely by scanning an NCVEC database by name, element taken, and date range, Joe would pop up. Now what? His new licensing action would be invalidated via registered mail and a note put in his file by the FCC, each administering VE manager would get a notice and Joe would be barred from taking any further test for a certain amount of time beyond the minimum. If he does it again, the time would be increased.

Additionally, a SFE (Statement of Failed Examination including test number) could be given by the administering VE team. Failure to produce it would go against the applicants' record with the FCC.

No mention is made regarding the existing Novice and Advanced licensees. They constitute 16.8 % of our licensees.

I can only support this RM with respect to keeping element 1 for the Extra and the sections regarding the VE process.

Thank you for reading and considering my view on this Rulemaking.

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